

## REMARKS

Reconsideration and allowance of the subject application are respectfully solicited.

Claims 17 and 19-22 are presented for consideration, with Claims 17, 19 and 20 being independent. Independent Claims 17, 19 and 20 have been amended and Claims 21 and 22 have been cancelled. Support for the amendments can be found in the original specification including, for example at page 20, line 17, *et seq.* As such, no new matter has been added.

### *Statement of Substance of Interview*

Applicant wishes to thank Examiner Dhingra for the courtesies extended toward their representatives during the personal interview of April 18, 2011, in the above-identified application.

In the interview, Applicant's representatives explained the features of the invention in view of Fig. 6 of the present invention. In particular, Applicant's representatives explained how a list of input edges of the plurality of overlapping graphic objects (for example, the list labeled 912'), is used to produce a list of non-intersecting edges (for example, the list labeled 912''). Applicant's representatives argued that none of Moore (US 2002/0015039), Koyanagi (JP 2000-013601), and Okubo (JP 11-073516) were seen to teach or suggest producing a list of non-intersecting edges from a list of input edges of the plurality of overlapping graphic objects, as recited in the claims of the present invention.

While the Examiner seemed to agree, the Examiner suggested it was unclear how a list of non-intersecting edges is produced. Applicant's representatives proposed to amend the claims to indicate that to produce a list of non-intersecting edges, at least one intersecting edge of

the plurality of overlapping input edges (for example, intersecting edge 918) is reordered and redefined (to be, for example, the non-intersecting edge 932). The Examiner agreed that the proposed amendments clarified the features of the present invention and that the arguments seemed to distinguish the invention from the cited art. The Examiner also indicated, however, that further search and reconsideration would be required.

### *Response to Rejections*

Claim 20 is rejected under 35 USC § 101 because the claimed invention is directed to non-statutory subject matter. While Applicant disagrees with the rejection, Claim 20 has been amended in manner suggested by the Examiner. As such, Applicant submits that the rejection has been overcome.

Claims 17, 19 and 20 are rejected under 35 USC § 103(a) as being unpatentable over Moore (US 2002/0015039) in view of Koyanagi (JP 2000-013601) and Okubo (JP 11-073516). Applicant submits that the cited art does not teach or suggest many features of the present invention, as previously recited in these claims. Therefore, this rejection is respectfully. Nevertheless, Applicant submits that independent claims 17, 19 and 20, for example, as presented, amplify the distinctions between the present invention and the cited art.

Independent Claim 17 relates to a computer implemented method of rendering an image comprising a plurality of overlapping graphic objects. The method, as amended, includes steps of generating a list of input edges in accordance with a plurality of boundaries of the plurality of overlapping graphic objects, wherein some of the input edges are overlapping, and producing a list of non-intersecting edges, from the list of input edges of the plurality of

overlapping graphic objects, by reordering and redefining at least one intersecting edge of the plurality of overlapping input edges on a per-scan-line basis. The list of non-intersecting edges defines (a) a plurality of boundaries of a plurality of non-overlapping graphic objects at the same priority level, said plurality of non-overlapping graphic objects being visually equivalent to the plurality of overlapping graphic objects and (b) a color for each of the plurality of non-overlapping graphic objects. The method also includes steps of converting the produced list of non-intersecting edges into an active edge list and rendering the active edge list into a plurality of sequential pixels.

The Office Action acknowledges, on page 5, that Moore fails to teach or suggest producing a list of non-intersecting edges from the list of input edges. As such, the Office Action relies on Koyanagi and Okubo to overcome certain deficiencies in the teachings of Moore. As discussed in the interview, none of the cited art, however, is seen to teach or suggest producing a list of non-intersecting edges from a list of input edges of overlapping graphic objects, much less teach reordering and redefining at least one intersecting edge of input overlapping edges. Accordingly, Applicant submits, therefore, that Moore, Koyanagi and Okubo, whether taken alone or in combination fail to teach or suggest producing a list of non-intersecting edges, from the list of input edges of the plurality of overlapping graphic objects, by reordering and redefining at least one intersecting edge of the plurality of overlapping input edges on a per-scan-line basis, as recited in amended independent claim 17. Accordingly, without conceding to the propriety of combining Moore, Koyanagi, and Okubo in the manner proposed in the Office Action, Applicant submits that such a combination still fails to teach or suggest Applicant's invention as set forth in Claim 17.

For at least the reasons noted, therefore, it is submitted that claim 17 as amended is patentable over Moore, Koyanagi and Okubo, whether these documents are considered alone or in combination. Claims 19 and 20 as amended recite substantially similar features to those referred to above in regard to amended Claim 17. Accordingly, for at least the reasons noted, it is submitted that Claims 17, 19 and 20 as amended are patentable over Moore, Koyanagi and Okubo, whether those documents are considered alone or in combination.

Accordingly, reconsideration and withdrawal of the rejection of the claims under 35 U.S.C. §103 is respectfully requested. Thus, it is submitted that Applicant's invention as set forth in independent Claims 17, 19 and 20 is patentable over the cited art.

In view of the foregoing, reconsideration and allowance of this application is deemed to be in order and such action is respectfully requested.

Applicant's undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our address given below.

Respectfully submitted,

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